

Table B-1. Summary of Scoping Comments

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<i>Comment</i>	<i>Response or Section Where Addressed</i>
Local Ocean Network	
1. Conduct project-level review of each alternative; address complete removal of the mounds, as well as removal of all except the caissons; analyze short-, long-term, and cumulative impacts.	Chapter 2, Chapter 3, especially Sections 3.2, 3.3, 3.4, and 3.5
2. Mussel tests will not be adequate because a) test will not reveal contaminant leaching into surrounding sediments and organisms residing in them; b) test will allow limited inference as to toxic exposure to humans through fish or shellfish, organisms higher up the food chain and hence more likely to accumulate fat-soluble toxins.	Section 3.2
3. Provide information on sublethal testing as well as standard LD-50, consult with EPA and Battelle, review Contaminated Sediment Management Strategy.	Section 3.2
SB County APCD	
1. Concurs with scope, no other comments.	Section 3.1
ChevronTexaco (CT)	
1. Supports expanded sampling and requests inclusion in Draft EIR.	Section 3.2
2. Incorporate enough security to minimize potential sample loss from mechanical failures, vandalism, enough redundant samples to offset potential losses.	Section 3.2
3. EIR should address trawlability as the only remaining permit issue.	Chapter 2 and throughout document

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ChevronTexaco (CT)	
4. Recommend full analysis of: a) leave mounds in place, with GPS to affected trawlers; b) leave mounds in place, with on-site habitat enhancement; c) leave mounds in place, with off site habitat enhancement.	Chapter 2, especially Sections 2.4, 2.5, 2.6
5. Rely more heavily on new sampling results than on previous study by de Wit.	Section 3.2
6. Minimize analysis of infeasible removal methodologies.	Section 2.1
7. Premature to conclude that an EA will be sufficient for COE; EA determines whether an EIS is necessary.	Chapter 1
8. Cautions use of deWit results regarding toxicity, suggests need for mixing model results (Limiting Permissible Concentration).	Section 3.2
9. Gorilla nets should only be used to flatten and remove small to moderate-sized debris.	Section 2.1.1
10. Shell cover appears to be effectively isolating contaminants, providing an adequate cap (MEC report).	Section 3.2
11. Address impacts of resumption of future trawling.	Section 3.5.4
12. Emphasize site-specific characterizations of individual mounds, avoid combining results for all mounds.	Section 3.2
13. Use MEC study results on contaminant accumulation; imperative to include results from SAIC sediment and mussel study.	Section 3.2

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ChevronTexaco (CT)	
14. CT believes trailing suction hopper dredge, bucket ladder, bucket wheel suction, and other suction dredges are infeasible and should not be considered. Reasons include operational depth limitations, inability to handle debris, and need to discharge large volumes of decant water.	Section 2.1
15. All removal alternatives must address decant water issue.	Sections 2.1, 2.2, and 3.2
16. Consider high volume electric submersible dredge (jet) pump system.	Section 2.1.1.4
17. Continuous line bucket not available yet, feasibility not demonstrated.	Section 2.1
18. Consider potential negative near-term impacts due to resuspension of materials during removal, based on results of current testing. CT suggests dredging may be ineffective at reducing contaminant levels in sediments, resulting in residual long-term impacts.	Section 3.2
19. NOP underestimates added volumes of decant water that would require handling, transport, disposal.	Section 3.2
20. Requirement to cap at 4-6% slope is excessive. Additional engineering design of capping needed. Consider adding hard substrate on mounds for enhancement.	Sections 2.1.4, 2.4, 2.5
21. Availability of sealed dump barges is limited, number of barge trips needed underestimated in NOP.	Section 2.2
22. Limited space at Port Hueneme, additional emissions associated with transport to LA/LB. Material subject to waste classification, could possibly require transport to Class 1 facility (Buttonwillow).	Sections 2.1.3.2, 2.1.3.4, 3.1

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ChevronTexaco (CT)	
23. CT believes no project alternative should involve retaining mounds as they are with no further mitigation. Stand-alone alternative should include provision of GPS equipment to affected fishers in the project area.	Section 2.8
24. Consider on- and offsite habitat enhancement through provision of hard substrate as project alternatives.	Sections 2.5, 2.7
25. Define “feasible.”	Section 1.5
26. Address emissions in SB, Ventura, LA Counties.	Section 3.1
27. Cites 1 knot currents near Hazel, and deepwater currents in general limiting the feasibility of capping. Site variation exists in sediment deposition and presence of marine organisms. MEC observed high densities of crabs.	Sections 3.2, 3.3
28. Address onshore and offshore traffic and solid waste disposal impacts.	Sections 3.7
Southern California Association of Governments	
1. Does not warrant comments at this time. Assigned SCAG Clearinghouse #.	No response needed
Environmental Defense Center	
1. Conduct project-level environmental review on each project description.	Chapter 2 and throughout
2. Include review of complete removal with/without caissons.	Chapter 2, Sections 2.2, 2.6

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Environmental Defense Center	
3. No-Action alternative places commercial fishers at risk and includes no successful method of marking the mounds.	Chapter 2, Section 2.8
4. Distinguish No-Action from any other alternative to mitigate risk to fishers or modify mounds.	Chapter 2, especially Section 2.8; also Section 3.5.4.7
5. Discuss short-term, long-term and cumulative impacts of removal and non-removal for each impact area.	Chapters 3 and 4
6. Include analysis of habitat value of mounds and whether mounds detract habitat from previously viable areas.	Chapter 2, Section 3.3, 3.5
7. Remove analysis of trawling as irrelevant to SLC and CCC permits.	Section 3.5.4
8. Mitigation and modification do not adequately address safety or toxics, therefore comment supports two alternatives: complete removal of mounds and caissons, and complete removal of mounds only.	Chapter 2, Sections 2.2, 2.6
9. See #3 above. See 4H Shell Mound Buoy Record showing continued conflicts with fishing, safety hazards. Address issues in No-Action discussion. Distinguish No-Action from any other alternatives involving mitigation.	Chapter 2 and throughout document
10. For each issue area, address short-term, long-term and cumulative benefits/impacts of both removal and non-removal.	Chapters 3 and 4
11. Supports removal, cites precedent.	Noted

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League of Women Voters (LWV)	
1. Remove all debris in accord with permit conditions. LWV not surprised that contaminants are present.	Noted, see e.g., Section 2.2
2. Important to study leaching.	Section 3.2
3. Given other platforms that will need to be removed in the future, it is important that this EIR establish best available technology for removing the shell mounds.	Chapter 2, especially Section 2.1
Senator Jack O'Connell	
1. First preference would be to declare shell mound removal as the project description and have others be alternatives. Important to address removal with/without caissons.	See Chapter 1 for Program EIR approach, Chapter 2 for Program Alternatives
2. Leaving mounds in place with or without capping can only be considered with a monitoring mechanism in place to monitor toxics indefinitely.	Chapter 2.
3. Mitigation to fishermen would also have to be through an ongoing program, existing into the future.	Section 3.5
4. Full review needed of short- and long-term and cumulative impacts, considering 20 platforms with similar shell mounds in the SB Channel.	Chapters 3 and 4
United Anglers of Southern California	
1. Oppose trawling in general, favor enhancement measures that should be given equal weight as an alternative. Requests further input on enhancement of shell mounds.	Chapter 2, especially Section 2.5

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<i>Comment</i>	<i>Response or Section Where Addressed</i>
Southern California Trawlers Association (SCTA)	
1. SCTA does not believe they would be able to fish in the area if the mounds were completely removed because of remaining debris on the seafloor and pipelines in the vicinity that snag gear and/or spoil the catch. See the letter for specifics.	Section 3.5.4
2. SCTA suggests that removal of the mounds would scatter sediment in the water and that the resulting news of a “toxic cloud” would raise concerns about the toxicity of fish caught in the area. They advocate that removal of the mounds should only be done during the closed season of the California Halibut Trawling Grounds (March 15-June 15).	Sections 3.2.4 and 3.5.4
3. SCTA does not consider the mounds in their current condition to be “fishy” or suitable as artificial reefs. They suggest that if the mounds can be capped to prevent leakage of potential toxins, a useable artificial reef could be created by placing quarry rock of the size recommended by DFG Guidelines on top of the capped mounds. They note the proximity of the mounds to Horseshoe Reef. They suggest augmenting the Hazel caissons with quarry rock. Reference is made to an original mitigation agreement with the trawlers that would have minimized the loss of trawl grounds.	Sections 2.3, 2.4
4. SCTA suggests that removal of the mounds and cleaning up debris will take longer than anticipated, and that dredging with the environmental bucket may go fast at first, but will slow down as the pile gets smaller. They ask how the remaining debris will be picked up.	Section 2.2
5. SCTA notes that in Louisiana, “gorilla nets” are dragged back and forth, east-west and north-south, in an overlapping grid to clean up remaining debris, prior to test trawling. They cite the need for a thorough cleanup of debris from the area before it could be considered trawlable.	Section 2.2

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Ventura County APCD	
1. The District recommends analysis in accordance with their 2000 Air Quality Assessment Guidelines as published on the web at www.vcapcd.org/pubs.htm . Specifically, the analysis should consider reactive organic compounds and nitrogen oxide emissions from all project-related equipment and vessels coming in and out of Ventura County.	Section 3.1